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14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' AMENDED
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL EXHIBITS TO
THEIR MOTION TO COMPEL
RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) amend their administrative motion for an order to file under seal Exhibits to Their Motion to Compel Responses to Interrogatories and Production of Documents (Dkt. 684).¹ Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Highlighted Portions	Plaintiff
Exhibit 3	Entire Document	Plaintiff
Exhibit 6	Entire Document	Plaintiff
Exhibit 15	Highlighted Portions	Defendants
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

Exhibit 1A is Uber’s First Set of Requests for Production, and the highlighted portions of Exhibit 1A contain technical information designated by Waymo as either confidential or highly confidential. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

Exhibit 3 is Waymo’s Responses to Uber’s First Set of Requests for Production. These Responses were designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo under the Protective Order. (Yang Decl. ¶ 3.)

Exhibit 6 is Waymo’s Responses to Uber’s First set of Interrogatories, which was likewise designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo under the Protective Order. (Yang Decl. ¶ 4.)

The highlighted portions of Exhibit 15 contain the email address of a high-ranking company executive. Defendants seek to seal this information in order to protect the privacy of

¹ This Amended Administrative Motion has been revised from the original (Dkt. 684) only with respect to Exhibit 15, in order to narrow Defendants’ request for sealing.

1 this executive, as prominent individuals at a company are currently the subject of extensive media
2 coverage. Disclosure of this information for such high-ranking executives could expose them to
3 harm or harassment. (Yang Decl. ¶ 5.)

4 Exhibit 18 is an internal Google presentation. This presentation has been designated as
5 “Highly Confidential – Attorneys’ Eyes Only” by Waymo. (Yang Decl. ¶ 6.)

6 Exhibit 21 is Waymo’s Third Set of Requests for Production to Uber. The highlighted
7 portions of Exhibit 21 have been designated as “Highly Confidential – Attorneys’ Eyes Only” by
8 Waymo. (Yang Decl. ¶ 7.)

9 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the
10 documents at issue, with accompanying chamber copies.

11 Defendants served Waymo with this Administrative Motion to File Documents Under
12 Seal on June 28, 2017.

13 For the foregoing reasons, Defendants request that the Court enter the accompanying
14 Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and
15 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –
16 ATTORNEYS’ EYES ONLY.”

17 Dated: June 28, 2017

MORRISON & FOERSTER LLP

19 By: /s/Arturo J. González
ARTURO J. GONZÁLEZ

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